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5 Attorneys for Defendant
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7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE

9 COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

10 LAW OFFICE OF DOUGLAS F. CUSHNIE,
11 a sole proprietorship, and
12 DOUGLAS F. CUSHNIE, individually,

CIVIL ACTION NO. 07-0020

13 Plaintiffs,

MOTION FOR PROTECTIVE ORDER

14 vs.

Hearing: August 26, 2008

15 BANK OF HAWAII, and MARY ROE and
16 JOHN DOE,

Time: 8:30 a.m.

17 Defendants.

Judge: Honorable Alex R. Munson

18 MOTION

19 Defendant Bank of Hawaii hereby moves the court for an order protecting it from being
20 required to produce any information in response to plaintiff's discovery requests that ask for
21 information that is not statutorily discoverable pursuant to 31 USC Section 5318(g) regarding
22 suspicious activity reports ("SAR's") and related information. This Motion is made pursuant to
23 Federal Rule of Civil Procedure 26(c) and 31 U.S.C. § 5318(g) of the *1992 Annunzio-Wylie*
24 *Anti-Money Laundering Act*, and related regulations (12 C.F.R. § 21.11(k) and 31 C.F.R. §
25 103.18(e)).

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RESPECTFULLY SUBMITTED,
CARLSMITH BALL LLP

Dated: July 22, 2008.

/s/
SEAN E. FRINK [F0212]
Attorneys for Defendant
Bank of Hawaii